

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

[1] JOEL MONGE,)	
)	
Plaintiff,)	
)	
vs.)	Case No. _____
)	
[1] RG PETRO-MACHINERY (GROUP) CO., LTD,)	
[2] RICHARD ENERGY, L.L.C.,)	
[3] RICHARD MOORE,)	
[4] EAGLE ENERGY SERVICES, L.L.C.)	
[5] BRONCO ENERGY SERVICES, INC.,)	
[6] EAGLE WELL SERVICE CO., INC., OF KANSAS,)	
[7] EAGLE WELL SERVICE, INC.,)	
[8] BRONCO DRILLING COMPANY, INC.,)	
[9] BRONCO DRILLING COMPANY, L.L.C,)	
)	
Defendants.)	

COMPLAINT

1. On September 29, 2008, near Hough, in Texas County, Oklahoma, Joel Monge, 26, a Colorado citizen, was seriously injured and permanently disabled when a defective and unreasonably dangerous 37-pound derrick cable block bumper of a 2006 Moor Rig XJ60 Workover Rig (Rig) designed, manufactured marketed and sold by Defendants RG Petro-Machinery (Group) Co., LTD., (RGPM), a Chinese company, Richard Energy, L.L.C., (RE) an Oklahoma limited liability company, and Richard Moore (Moore), to Eagle Energy Services, L.L.C. (EES), a Kansas limited liability company, and/or Bronco Energy Services, Inc. (BES), an Oklahoma corporation, and/or Eagle Well Service Co., Inc. of Kansas, a Kansas corporation, and/or Eagle Well Service, Inc., an Oklahoma corporation (both hereafter EWS), failed and fell about 90 feet,

striking Joel Monge in the head and knocking him off the work platform of said rig and onto the ground below. EES and/or BES and/or EWS provided the rig to EWS and/or Bronco Drilling Company, Inc. (BDCI) an Oklahoma corporation, and/or Bronco Drilling Company, L.L.C. (BDCL), an Oklahoma limited liability company. Plaintiff has reason to believe RGPM, RE, and Moore contend the operation and maintenance of said Rig by EWS and/or BDCI and/or BDCL was substantially certain to cause injury.

2. This court has jurisdiction pursuant to 28 U.S.C. § 1332(a)(1), because the matter in controversy exceeds \$75,000 and is between citizens of different states.

3. This Court has venue pursuant to 28 U.S.C. § 1391(a)(2), because this is the judicial district in which a substantial part of the events or omissions giving rise to the claim occurred.

4. The failure of Defendants' rig caused traumatic brain injury, C5-C6 cervical fractures, C2 ASIA B spinal cord injury, fusion of C5-C7 vertebrae, with loss of feeling and movement from the chest down, resulting in permanent quadriplegia and many complications.

5. As a result of the injuries, harm and permanent disability caused by Defendants' defective and unreasonably dangerous rig, Joel Monge has and will endure physical pain and suffering, mental pain and suffering, permanent physical impairment, and disfigurement; has and will lose earnings and his earning capacity has been impaired; has and will incur enormous expenses for necessary medical care, treatment, and for

necessary around the clock services just to remain alive, and has been damaged in a sum in excess of \$75,000.

6. Jasmine, 8, and Jazayra, 5, are the minor daughters of Joel, and as a result of the harm suffered by their father, have and will sustain emotional suffering, lose the services, society, comfort, companionship, parental relationship and guidance of their father Joel, and have each been damaged in a sum in excess of \$75,000.

PRAYER

WHEREFORE, Plaintiff prays judgment against Defendants in an amount in excess of \$75,000, exclusive of interest and costs; and for interest and costs and costs thereon.

NORMAN & EDEM, PLLC

/s/ John W. Norman

JOHN W. NORMAN, OBA #6699

BRADLEY E. NORMAN, OBA #18975

NORMAN & EDEM, P.L.L.C.

Renaissance Centre East

127 Northwest 10th Street

Oklahoma City, OK 73103-4927

Telephone: (405) 272-0200

Facsimile: (405) 235-2949

Email: jwn@nemw.com

ATTORNEYS FOR PLAINTIFF

Attorneys Lien Claimed, Jury Trial Requested